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# FEDERAL ASSISTANCE REVIEW

## PROJECT NO. 3



ADMINISTRATIVE AND LEGAL  
CONSTRAINTS REMOVED

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## I. INTRODUCTION

Under the Federal Assistance Review Program, a Department-wide project was initiated to "Remove Unnecessary Departmental and Agency Administrative Constraints." This report includes all accomplishments on reported constraints submitted since the inception of the FAR Program.

A total of 193 external constraints were reported to the FAR Staff. Of these, 127 were imposed by internal Department regulations, 52 by other Federal agencies, and 14 by law. These constraints were referred to appropriate staff offices of the Department for review and appropriate action.

As a result of staff offices' actions, 68 constraints were removed, 97 were continued for good reason, and 13 are still being considered. In 15 cases, misunderstandings or erroneous interpretations were cleared up.

The constraints have been grouped by subject matter. The action taken on each constraint is summarized in Parts I through XII of the following report.

In addition to the external constraints, agencies were also asked to review their internal regulations or procedures and report accomplishments to the FAR Staff. Summaries of agency accomplishments are reported in Part XIII of the following report.

USDA Federal Assistance Review Staff  
April 1972





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**Note:** After constraints were acted upon, the "Office of Management Improvement" was changed to "Office of Information Systems," and "Consumer and Marketing Service" was changed to "Agricultural Marketing Service." The earlier nomenclatures are used in this report.





# I. OFFICE OF PERSONNEL

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
1.	Agency must submit written justification in support of proposed classification of Administrative Officer (GS-341) positions at GS-11, 12, and 13 for analysis and prior concurrence.	FS, FHA	The review of Administrative Officer positions required by a memorandum dated July 15, 1963, from Mr. T. T. Townsend is no longer necessary. The memorandum has been cancelled.
2.	Prior approval of GS-14 and GS-15, and Staff Office clearance of Key positions.	FHA, ERS, C&MS, ARS, FS, SCS, ASCS	We are developing a new system for handling Key positions with the objective of eliminating the prior approval of individual actions in most cases.
3.	Police checks required as part of preemployment suitability determinations.	ERS	This constraint will not be changed. The high incidence of the employment of individuals with serious criminal records and the fact that the Interagency Board of Examiners stopped making police inquiries prior to certifying individuals for possible employment cause this requirement to be imposed. These have not changed to any substantial degree to permit consideration of the elimination of this requirement. In addition, experience indicates that employees who falsify applications regarding arrests are seldom removed as a result thereof and there is a correlation between falsification of applications for employment and subsequent misconduct.
3a.	OP prior approval before hiring persons with certain employments, criminal records, and conduct background.	FS	Personnel Letter No. 731-1 was issued January 29, 1970, to eliminate prior approval for temporary appointees.



No.	Subject	Agency	Decision of Office of Personnel
4.	Required time interval of 2 years between cash awards and 3 years between quality increases.	C&MS	Effective November 20, 1969, regulations in AG 531 were revised to <u>permit annual quality increases</u> . Regulations in AG 451 are not intended to restrict granting cash awards in two consecutive years but to assure consideration for a quality increase.
5.	Loyalty checks on non-Federal training organizations. Security clearance should be good for more than 6 months.	SCS	This loyalty check is required by law and the CSC and not OP. Security clearance under DPM regulations is good for 1 year.
6.	Prior approval of acceptance of contributions in connection with outside training.	SCS	A recent revision of DPM Chapter 410 delegated this authority to the agencies.
7a. & b.	Prior approval of cash awards for GS-14 and up.	SCS, FS	This requirement will be retained.
8.	Performance rating procedural requirements. Effectiveness has largely been supplanted by the Salary Reform Act of 1962, Incentives Awards Act, and Adverse Action regulations. Remaining requirements inhibit supervisor-employee review and discussion of performance because of requirement of conformance to a strict procedural approach. The main purpose of process tends to become one of conforming to procedural requirements rather than a free discussion and review of performance.	SCS	For several years the Department has submitted to the CSC in response to requests for legislative proposals to improve personnel administration our recommendations for the abolishment of the Performance Rating Act of 1950. The CSC does not intend to seek abolishment of the Act at this time. However, it has established a special study group which will recommend some changes in the regulations which will eliminate some of the burdensome procedural requirements.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
8a.	Authority to defer performance ratings is limited to Agency Head.	FS	DMP Chapter 430 was amended December 23, 1969, to permit redelegation of this authority to Heads of each office having delegated employment authority.
9.	Restriction (\$100-\$350) on amount of Cash Award that can be granted for special achievement.	SCS	This restriction is set by CSC and not OP. The Department opposed this restriction. Since it was imposed on July 1, 1969, CSC felt it was inappropriate to make a change so soon, but plans to have this scale reviewed periodically by a LAG Committee.
10.	Limitation on amount of Cash Award an agency can approve (\$1,500).	FS	This amount has been raised to \$2,500.
11.	Quarterly reports on progress under Federal Women's program. Should be changed to semi-annual to be consistent with other EEO reports.	SCS	This frequency of reports is set by CSC and not OP. This has been called to the attention of CSC, and it is our understanding they are considering the elimination of the separate Report on the Federal Women's Program. Until such action is taken, quarterly reports will be required.
12.	Prior approval of unit recognition and agreements under EO 10988.	ARS, FS	The approval of unit recognition is the responsibility of the Assistant Secretary of Labor for Labor Management Relations and is, therefore, outside the control of the Department. Our regulations do require that agencies consult with us before taking a position on unit questions. However, no written review or formal approval is required.
13.	Prohibition re establishing "ai" supervisory positions.	FS	DPM 312 was amended December 3, 1967, to eliminate this prohibition.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
14.	Grade stacking prohibition.	FS	This applies only to GS-15. Stacking is possible below GS-15 if supported by CSC standards and procedures.
15.	Prohibition of redelegation of classification, employment, and adverse action authority by other than Agency Head.	FS	FS has been authorized by memo of January 23, 1970, to permit redelegation of employment, classification, and adverse action authority by Regional Foresters.
16.	Reporting first aid cases on Form AD-135.	FS	This requirement has been eliminated since Form AD-278 and the ADP system of safety data have been implemented.
17.	Prior approval to use paid advertising in recruiting.	FS	DPM 332 was amended September 11, 1970, to provide for delegation of this authority.
18.	Requirement to send OPF, SF-171, and AD-67 on prior approval cases.	FS	The OPF is needed for security clearance purposes. SF-171 and AD-67 are needed for review of employment or classification proposals. Therefore, all three will continue to be required.
19.	Review of Medical Officer on agency initiated disability retirement and other separations involving fitness.	FS	These actions are very sensitive and have many ramifications that if not handled properly can cause a great deal of difficulty. Contact with the Department Medical Officer can be made by phone, so we can see no basis for a contention of delay. This requirement will not be changed.
20.	OP action on results of full field investigation of CCC employees.	FS	This constraint will not be changed.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
21.	OP must make or arrange all contacts with CSC on retirement coverage and policy.	FS	Questions of retirement coverage and policy on individual cases could have Department-wide impact and only the Office of Personnel can determine that. This constraint will not be changed.
22.	Employee who works 25 years or more must receive a letter of appreciation upon retirement.	FS	This constraint will not be changed. Additional means of recognizing the employee's service may also be used.
23.	Post audit of adverse action materials.	FS	This provides OP with a means for obtaining information regarding the volume and nature of disciplinary problems. It serves as a training device for agencies. It provides an opportunity to spot actions clearly contrary to Department or CSC regulations. This constraint will not be changed.
23a.	Department is appellate level of appeals involving 6 to 30-day suspensions.	FS	Effective 4-1-71, the FPM and DPM 771 were revised so that suspensions of 30 days or less are treated as grievances.
23b.	Prior approval of adverse actions at GS-14 and up.	FS	Cases involving such employees are normally of concern to the Office of the Secretary. Congressional interest frequently occurs in such cases, and, generally speaking, this is best dealt with at the Department level. This constraint will not be changed.
24.	Prior approval of employment of GS-14 and 15 at higher than first step.	ARS	DPM Chapter 277 was amended, December 23, 1969, to abolish this requirement.
25.	Prior approval of BEC for medical treatment in other than injury or accident cases.	FS	BEC has rejected the Department's request for relief from this requirement. This constraint will remain.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
26.	Prior approval or less than \$10 per diem for full-time training.	FS	This requirement is necessary to maintain a uniform rate per location throughout the Department. This constraint will not be changed.
27.	Because of appointment authority retained by OMS, the Agency regional (field) offices cannot make direct hire appointments. Removal of the constraint would reduce the time it takes to bring new hires into the Service; reduce paperwork; and avoid the loss of talented recruits because of unnecessary delays in hiring.	OIG	Referred to OMS, who will delegate increased procurement authority if needed.
28.	Authority to exercise employment authority contains authority to process adverse actions. The agency prefers not to have authority to take adverse action to accompany authority to appoint in all cases.	FS	The Office of Personnel shares this concern. Chapter 751-1-1(2) of the OPM provides that exceptions to the regulations shall be made only with permission of the Director of Personnel. OP will consider any requests from agencies for exceptions under this regulation, provided they indicate in detail exactly what their need and intent is.
29.	Only the Department Security Officer can advise other agencies of an employee's security clearance when the employee is to visit an installation where security clearance is required.	FS	This authority cannot be delegated to the employee's Personnel Officer. A number of problems involved in such delegation make it administratively not feasible.



No.	Subject	Agency	Decision of Office of Personnel
30.	Authority to issue driver identification cards is delegated to employment officers. The agency recommends that further delegation be allowed.	FS	AG Chapter 930,1-10a and AG Chapter 931, 1-10c do not restrict the authority to issue driver identification cards to employment officers. "The responsibility for issuance of the identification card may be placed in a responsible official of the agency . . ." (See AG Chapter 930, 1-10a)
31.	The agency considers it impractical to prepare the Annual Plan for Paid Advertising in Recruiting, which forecasts the most effective type of paid advertising.	FS	This constraint has been deleted from the Department Personnel Manual.
32.	Authority to sign appointment affidavits can only be given by the agency head. Agencies should be given authority to delegate and authorize redelegation.	FS	This authority has been delegated to the agency head with authority to redelegate. This was accomplished in an amendment of October 12, 1970, of OPM Chapter 295-6-8a(1), second paragraph, to read as follows: "Authority to designate employees who are authorized to administer oaths is delegated to the head of the Agency and this authority may be redelegated by the head of the Agency."
33.	For performance rating appeals filed in USDA, the Agency Head is authorized to make the decision only if it concurs with the hearing panel's recommendation. If the Agency Head disagrees, the file must be forwarded to OP for decision. There should be only one decision level, either the Agency Head or OP.	FS	It is anticipated that changes to simplify this procedure will be included in amendments to DPM Chapter 771.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
34.	An employee who desires to file an appeal with USDA on a performance rating must file it with his employment office. The appeal must then be forwarded through channels to OP. The Agency requests that the appeal be filed with the office having decision-making authority.	FS	It is anticipated that changes to accomplish this will be included in amendments to DPM Chapter 771.
35.	Requirement for OP clearance of Incentive Awards material.	OIG	DPM regulations do not require clearance of Incentive Awards material prepared in the agency. The purpose in sending 40 copies of the agency material to OP is to circulate them among the agencies of the Department for an exchange of ideas. This material might include newsletters, flyers, posters, contests, or publicity of any kind promoting employee suggestions or any awards program. According to our records, OIG has never sent any of the above awards material to OP and, therefore, we cannot see where this procedure could have caused a time delay in processing.
36.	CSC approval for waiver of qualifications for reassignments and promotions under MUST and similar Upward Mobility Programs.	OIG	The Office of Personnel is currently writing a new Upward Mobility training agreement.
37.	Limitation on Classification and Employment authority.	FS	All prior approvals for classification are presently under study.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
38.	Processing of Executive Assignment cases under a dual search system - CSC and USDA.	FS	We do not believe it is in the best interests of our employees to discontinue the internal search for candidates. This is based on the fact that the Executive Inventory search process had not been consistent in identifying USDA employees who should be given consideration. If an agency feels that for certain positions the EI search consistently produced a list of USDA candidates identical to the USDA internal search, it should submit a request to this Office with supporting data to justify relief in the specified circumstances.
39.	USDA Executive Promotion Plan limits promotion certificates to 3 to 5 candidates.	FS	<p>The policy has been modified where more than 5 highly qualified candidates are identified as follows:</p> <p>The number of candidates should be reduced to at least 5, but not less than 3. This reduction is accomplished through further evaluation of the candidates by the evaluation committee. When more than 5 candidates but less than 10 are to be certified to the selecting officials, the promotion record must show the basis for the conclusion that meaningful distinctions cannot be made among a smaller number.</p>
40.	Requirement to submit monthly statistical report on accessions, conversions, and separations of veterans employed under the Veterans Readjustment Authority.	FS	The monthly statistical report now comes from MDSC.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
41.	Government employee must be issued a U.S. Government Motor Vehicle Operator's License to drive a Government vehicle.	SCS	The U.S. Government Motor Operator's Identification Card is not a license to operate a motor vehicle. A valid State operator's license is required to operate any motor vehicle, private or Government-owned. The Government ID card must be carried when operating a Government-owned vehicle. The purpose of the ID card is to provide a review of the employee's driving record and physical fitness to operate a motor vehicle. The ID card procedure in some instances has uncovered poor driving records even though the person had a valid State license.
42.	Reemployment of retired employees under most authorities requires employee to reduce salary.	SCS	This is a constraint imposed by law and not by OP. We feel there is little justification to pursue this with the CSC or through legislative channels since we have encountered no particular difficulty in reemploying annuitants under the current provisions. Many agencies of the Department, as evidenced in our Quarterly Report of Experts and Consultants, obtain the services of annuitants to serve in the area of their expertise, and many serve without any compensation whatsoever.
43.	Each agency shall establish and maintain a system which provides statistical employment information by race and national origin. Data shall be collected by visual identification and shall be disclosed only in the form of gross statistics.	SCS	The Civil Service Commission was contacted upon receipt of this constraint to determine whether there was any weakening in their position concerning individual identification of minority group employees. The CSC's position remains the same, and they will not entertain any reconsideration of this position at the present time. This Office made a previous attempt to obtain name information with respect to our review of employees' progress under the Critical Review Index program and we were turned down, even though the CSC realized our efforts were directed toward upper mobility of these employees.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
44.	Restricting promotion of quality student trainees who meet the qualification requirements for the GS-7 grade upon graduation.	SCS	Contact was made with the Civil Service Commission. The Commission's reply eliminated the need to regard this subject as a constraint.
45.	Specific dollar limitation on special achievement awards based on the grade level of the recipient of the award.	SCS	The Department is still on record as opposed to the narrow range of cash awards for job performance. We have recommended that the CSC consider reissuing regulations using the current amounts as a guide but extending the limit to the amount of the employee's step increase. At a CSC meeting, it was reported that 4 other Federal agencies had also complained and that the CSC will review this regulation.
46.	Cooperative Work Study program provides for initial appointments under Schedule B of quality student trainees only in shortage occupations.	SCS	The CSC approved two modifications of the rating schedule of the FSEE and the Biological and Agricultural Sciences examinations to give special credit to students who graduate under Cooperative Work Study programs. These changes result in a qualifying score of 100 being assigned. We believe this will equate to approximately the same flexibility as the Schedule B concept. Should the modified provisions prove unworkable in SCS, data should be submitted to support that position with the suggestions for needed revisions.
47.	Organizational changes in name, function, or staffing require Departmental approval of a revised organization chart down through the Branch level in the headquarters office, and through the Division level in the field.	FS, ASCS	We expect that as a result of a current study, recommendations can be made to the Assistant Secretary for Administration which will reduce the type and number or reorganizational proposals requiring prior approval in the Office of Personnel.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
48.	SCS is assigned the responsibility to provide forestry technical services to private landowners when such services are not available from State agencies. The Forest Service has excellent relationship and rapport with the States in its cooperative forestry program and has the necessary expertise.	FS	It appears the SCS is clearly restricted in its authority and responsibility in forestry technical services. The FS should not be constrained thereby. The effect of the AR is to provide the farm operator with required services through one agency. The official comments and views of both agencies should be obtained and any problems resolved between the two agencies.
49.	SCS has been assigned technical responsibility for income-producing recreation on private non-industry forest lands. Since State Foresters have responsibility for Multiple Use Management technical assistance in the States, some States disclaim responsibility.	FS	It appears the SCS is clearly restricted in its authority and responsibility in forestry technical services. The FS should not be constrained thereby. The official comments and views of both agencies should be obtained and any problems resolved between the two agencies.
50.	An annual review of Personnel Officer positions is required.	FS	The CSC requires that the Department have a plan for classifying Personnel Officer positions. OP is exploring alternative ways of complying with CSC minimum requirements and hopes to eliminate the annual reporting requirement.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
51.	A semi-annual report on positions abolished appears to have no value.	FS	The report is required by the House Committee on Post Office and Civil Service pursuant to the Salary Reform Act of 1964. The purpose of the review and report is to stimulate more efficient use of manpower resources in the Federal Government. The reporting requirement will be retained.
52.	Field offices are not delegated authority to classify Personnel Officer positions at the GS-13 level, and there is a pre-audit requirement for Administrative Officer positions at GS-12 level and above on National Forests.	FS	There is only one GS-13 Personnel Officer at the field level in the Forest Service. OP is giving further consideration to this constraint.  OP intends to remove the pre-audit requirement and issue an internal USDA Guide.
53.	A Department record check is required when applicants show previous employment with the Department.	FS	This constraint will be eliminated.
54.	Change monthly reporting of progress on EEO activities to quarterly or semi-annually, which should be adequate.	SCS	The Department must remain responsive to the White House Staff which requested EEO information on a monthly basis.
55.	Eliminate quarterly report required by the Federal Safety Council. The agency feels the present reports are of questionable accuracy because of reporting estimates rather than actual instances.	SCS	The Federal Safety Council currently is planning a complete review of the accident reporting requirements in accordance with the Occupational Safety and Health Act of 1970. Reports may be modified, but not discontinued. When the Department ADP accident and injury reporting system is operational, agencies will not be required to submit statistical reports.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
56.	Requirement that classification and organization be included on Form AD-67 submitted with employment actions for Department approval when the position involved is classified under delegated authority and the position has been previously established with approval of OP and/or the CSC.	ASCS	The entire system of Department prior approvals for GS-14 and above positions is currently under review, and a plan has been sent to the Secretary for his approval. The form will need to be changed to bring it in line with the proposed new system, and suggestions to improve the form and alternative ways of securing these prior approvals will be considered, assuming the Secretary approves the proposed system.
57.	Restriction against placing an employee in a position where sensitive material could be kept from him until his clearance is received when an employee is appointed or promoted to a position which requires clearance.	ASCS	The proposed system is in direct violation of Section 3(b), Executive Order 10450, which states, "Any position (i.e., sensitive) so designated shall be filled or occupied only by a person with respect to whom a full field investigation has been conducted." Further, it is considered a poor practice. The necessity for such a system can be eliminated by planning. The constraint will be retained.
58.	Unit recognition and agreements coming under Executive Order 11491 (Labor Management Relations) must receive Department approval.	FS	Section 15 of the Executive Order 11491, as amended, requires that the Secretary, or an official designated by him, approve all agreements. The Secretary has designated the Director of Personnel as the representative for this purpose. The constraint will be retained.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Personnel</u>
59.	There is a requirement for a quarterly report of estimate of full field investigations. This information can be obtained from the annual estimate of the total number of full field investigations to be requested during the entire fiscal year.	FS	The requirements are imposed by the Civil Service Commission. CSC recently made a study of this report and of its value in relationship to the total cost. At such time as the Commission deletes or amends the reporting requirement, it will be implemented by the Department.
60.	Field units are required to obtain Departmental approval before arranging for a fitness-for-duty examination for an employee with a Federal medical installation.	FS	Regulations do not require that the approval of the Department Medical Officer be obtained before arranging for a fitness-for-duty examination of an employee. Perhaps regulations were misconstrued in that they do require that the physician selected to conduct the fitness-for-duty examination must be acceptable to the Department Medical Officer, or his acceptability may be passed on by a physician of the U.S. Public Health Service or the Civil Service Commission.

II. OFFICE OF INFORMATION

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Information</u>
1.	All visual work must be handled through Office of Information. Agencies cannot even deal with private companies. Agency claims duplication of effort.	FS	Centralization assures conformance with policy. Decentralization would create duplication.
2.	Agency must use OI personnel to obtain visual services. Agency claims OI personnel limited. Special talents frequently needed, not available.	SCS	Centralization assures conformance with policy. Decentralization would create duplication.
3.	Prohibition against credits on photographs or illustrations. Credits needed to stimulate interest and effort.	SCS	Regulation formerly a requirement of Congressional Joint Committee on Printing. Still kept by OI. It has been generally agreed among agency representatives that if credits are to be granted, some systematic set of standards must first be developed by which to judge work. Until such standards are developed, however, agencies should continue to employ other techniques to stimulate creativity.
4.	OI approval required for employment of visual specialists.	SCS	Approval requirement assures best possible individuals employed when necessary.

No.	Subject	Agency	Decision of Office of Information
5.	Agency objects to need for OI (and sometimes Joint Committee on Printing) approval before duplicating and related equipment can be obtained. Agency specifically objecting to request for varityper turned down by OI.	SRS	Requirement based on JCP Regulations. Current regulation "provides a most workable and economic procedure." Department has been commended by JCP. Rejection of varityper based on inadequate justification.
6.	Commercial printing must be procured through GPO. Results in complicating the procurement process by a "middle-man." Suggest built-in term contract similar to Federal Supply schedules for direct-agency use. Specifications on printing are <u>not</u> more technical than other procurement specifications.	C&MS	"JCP feels these procedures are necessary in the interest of order and economy." OI found several cases where agencies dealt directly with contractors and paid three times the price. Specification for printing more technical than other procurement specifications.
7.	Field Offices duplicating limited to 5,000 single pages or 25,000 total pages on multiple page jobs.	SRS	Based on JCP Regulation, although agencies can request a waiver.
8.	Same as above. Agency points out that where duplicating facilities are already established, this requirement results in increased overhead and administrative expense. Suggest agencies be authorized to exercise judgment.	C&MS	If JCP limitation was eliminated, equipment would be used improperly and large backlogs would result from overloading. Regulation is not <u>really meant</u> to be inflexible when there is a clear need to exceed the limit in meeting deadlines and other emergencies.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Information</u>
9.	JCP limitation on printing in Department's Printing Plant (120,000 impressions) slows down completion, creates paperwork and raises costs. Frequently interim supplies must be run in Plant, thus duplicating start-up costs when balance is handled through GPO.	C&MS	This requirement is imposed by the Joint Committee on Printing and will be retained.
10.	OI requires that all printed matter be delivered to OI platform and OI will redeliver to only one point, resulting in extra handling and delays. Similar problems not encountered in other purchasing.	C&MS	Constraint statement not entirely correct - deliveries handled differently sometimes. Lack of facilities and manpower does not permit fragmented deliveries. However, during 1970 a new procedure was worked out with C&MS: OI provides C&MS with a duplicate copy of the delivery receipt and makes an electric delivery truck available for use by C&MS, if desired.
11.	Agency required to submit lists of meetings to Visitors Center. Agency objects to monthly report and particularly including in-service meetings.	FS	Agency no longer required to report. New procedure since November 10, 1969, provides that Visitors Center calls agency in order to complete listing.
12.	Mid-year report of Publication Control Program.	C&MS	Constraint removed. A mid-year report of the Publication Control Program is no longer required.
13.	Requirement that printing orders and requisitions for printing handbooks be processed through Department Office of Information.	ASCS	The agency has failed to show that there would be either savings in time or elimination of work steps. The same procedures, the same forms, would have to be completed and forwarded as at present, regardless of who handles these tasks.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Information</u>
14.	Agencies are not authorized to prepare SF-1, Printing and Binding Requisition, which goes to GPO, but submits AD-78 to the Department, who transcribes the information on SF-1.	ASCS	The AD-78 is used to supply the information needed for the SF-1 and to serve as a control card and a permanent record. Information supplied by the agencies is either incomplete or incorrect or both. The printing technicians can evaluate the information and make the necessary corrections and adjustments. The restriction will be retained.
15.	Agency is not authorized to deal directly with local handbook contractors.	ASCS	Central control is required by regulations. The contract is also used by other agencies in the Department. To get maximum benefit from the contract, close coordination and proper management of the schedule is required to meet tight deadlines. INF is best able to meet these objectives under the present system. The requirement will be retained.
16.	Agencies must obtain Department approval to purchase more than 1,000 official reprints.	FS	It has been determined that the requirement for obtaining approval from INF for purchase of official reprints can be removed, and that responsibility for determining the need for and approving the purchase of such reprints can be transferred to the Agency Head. An information memorandum to this effect will be issued in the near future, to be effective until such time as the regulation itself is officially amended.
17.	Agencies must obtain Department approval to purchase reprints written by other than Government employees.	FS	It has been determined that the requirement for obtaining prior approval from INF for purchase of non-official reprints can be removed, and that the responsibility for determining the need for and approving the purchase of such reprints can be transferred to the Agency Head. An information memorandum to this effect will be issued in the near future, to be effective until such time as the regulation itself is officially amended.

### III. OFFICE OF PLANT AND OPERATIONS

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
1.	APMR 104-18.5003 requires Department approval for administrative sites acquired by FS having a total fair market value of \$5,000. This value should be raised to \$10,000.	FS	The cost limit on land was too low in view of the current market values and was raised to \$10,000. The regulations were revised and issued September 9, 1971.
2.	GSA has not made staff available to update Occupancy Guides of 1962 for what is now C&MS, causing extra paperwork, needless cost, and delay, and hampering of programs because of lack of acceptable guides.	C&MS	Occupancy Guides are still in use throughout Government. GSA, who has responsibility to update guides and makeup for new agencies, has stated it has never turned down a request. P&O has no record of such a request from a USDA agency or to GSA, and agencies wishing to do so should make a formal request to P&O and should indicate at that time the staff available to work with GSA and P&O.
3.	Limitation of one year leasing authority should be removed in interest of economy in space rental costs as it is becoming increasingly difficult to acquire space for short tenure at competitive prices and within Economy Act rental limitations.	C&MS	The Administrator of GSA is the only one who may delegate term leasing authority to other Government agencies. He will delegate leasing authority for special purpose space. We now have blanket authority established for a number of categories in this area. We will contact the Administrator of GSA and request 3-5 year term leasing authority in small communities in non-urban areas on a case-by-case basis.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
3b.	Congressional limitation requires establishing 15% of fair market value of premises to be leased when annual rental will exceed \$2,000. This was set in 1932.	C&MS, SCS	This was established by law and discussions with GSA indicate it has no plans at this time to request an increase. We agree an amendment to present law is desirable and have contacted the Administrator of GSA regarding the inclusion of this in his legislative program.
4.	Leasing of space in GSA urban areas should be modified to permit agencies to acquire own space after GSA has determined that Federally-controlled space is not available in order to eliminate delays in or hampering of programs.	C&MS, SCS	No further action at this time because of lack of documentation of any problems. GSA maintains it has a mandate to do the leasing and the staff to do it. If a case history to support the allegations is developed, appropriate action will be taken.
5.	Approval should be delegated to Administrator of GSA for transfer of excess Federal lands suitable for National Forest purposes having a total appraised market value of \$100,000 or more, instead of having GSA secure concurrence of OMB as now required.	FS	GSA feels OMB will not permit transfer of real property having an appraised fair market value of \$100,000 or more without OMB approval. OMB approach is that they are exercising authority to review agencies' programs. All use of real property is under study now as a result of E.O. 11508. A subcommittee of the President's Property Review Board, in which USDA participated, did recommend to the Chairman of the Property Review Board that GSA approval authority be increased to \$100,000.
6. ) 7. )	Restrictions on procurement of supplies, materials, furniture, and equipment.	C&MS	The agency has withdrawn these constraints. No action was taken.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
8.	GSA limitations on styles and types of Class A executive office furniture. Agencies want furniture in keeping with today's standards and trends.	C&MS	P&O does not consider the reported constraint to be valid. Although FSS FSC Group 71, Part VI is schedule for traditional executive office furniture which is heavy and bulky, Parts VIII and XII of same schedule and furniture available from Federal Prison Industries, Inc., are sources for executive office furniture of modern design.
9.	Restriction of authority to sell Government-owned personal property.	SCS	Although P&O agrees with this proposal, previous efforts with GSA to have it removed were not effective. No additional action will be taken to have this constraint removed unless SCS submits additional information to support its position.
10.) 11.) 12.)	C&MS is allowed only two digits on FEDSTRIP requisitions to identify the fund to be charged. C&MS has three digit accounting code and is thinking of using five digits under a cost center accounting system.	C&MS	Agencies are not limited to two digits on FEDSTRIP requisitions to identify the fund to be charged. The originator of a FEDSTRIP requisition is required to enter a fund code in card columns 52 and 53 of each requisition. The originator has the option of using a project code in card columns 57 through 59. The combination of card columns 52, 53, and 57 through 59 allows C&MS to show the five digit accounting codes on their FEDSTRIP requisitions, and C&MS is now using this combination in its accounting system. No further action is necessary.

No.	Subject	Agency	Decision of Office of Plant and Operations
13.	Exemption of participation in GSA Motor Pools would result in considerable savings.	SCS	<p>The Department favors withdrawal of SCS from participating in Interagency Motor Pools in all cases where vehicles are permanently assigned or there is no demonstrated economy to the Government. USDA has appealed GSA Administrator's determination on behalf of SCS. Letter of 12-12-69 to Commissioner of Transportation and Communications Service, GSA, requested exemption of SCS from IMP participation and for transfer of assigned vehicles to SCS. By letter dated 4-20-70, the Commissioner of TCS-GSA advised that further action on this constraint would be withheld pending completion of a GAO study. GAO Report 13-114833 dated August 13, 1971, does not address itself to this issue. SCS is updating its data in support of a new request for exemption.</p>
14.	Restrictions on year-end procurement.	ARS	<p>This has to do with an arbitrary cutoff date set in our regulations for the opening of bids (1) for construction May 15; (2) for supplies June 15. Exceptions are required to be justified in the file. The AGPR has been amended to remove these dates.</p>
15.	<p>Dollar Limitation - Contracting Authority. AGPR 4-1.4 requires agencies to obtain concurrence of Director, P&amp;O for delegation of contract authority within their agency.</p>	C&MS, SCS	<p>AGPR 4-1.4 has been modified so agencies that have adequate policies and controls for selecting, designating and terminating designations of contracting officers will have authority to delegate procurement contract authority within their agency. (Two agencies have been granted such authority.) A further amendment to this section of the AGPR's is now being processed which establishes selection criteria for contracting officers. Agencies that meet these criteria will have no difficulty in obtaining contracting authority with the power to redelegate this authority in their respective agencies.</p>



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
16.	Restriction of field offices to \$50 or less for services not available from GSA.	OIG, SRS	OMS will delegate increased procurement authority when field offices have need for such authority.
17.	Agency must obtain Departmental clearance for the design and construction of offices, laboratories, etc., in excess of \$50,000. Due to inflation, this limitation should be increased to \$100,000.	FS	Regulations revised September 1971 increased limitation to \$100,000.
18.	Mailing lists are not updated promptly, and there is no feedback from the system to let agencies know what changes have been made.	ASCS	The mailing list system has been changed to permit updating in a single cycle. Changes are now made, generally within 7 days. Feedback on 3x5 printout cards is now provided for critical lists.
19.	Agency is required to obtain a GSA waiver for purchase of similar GSA-carried items from another source in an emergency.	ASCS	A waiver from GSA is not required for procurement from a non-GSA source when property or services are needed at once because of cases such as fire, flood, explosion, earthquake, nuclear attack or other disaster. Small purchases, other than those made as a result of the cases mentioned above, may be made at the site of work or point of need in satisfaction of day-to-day requirements that cannot be foreseen. Such purchases shall be made in accordance with FPR S1-3.6, and the quantities procured shall not exceed immediate needs (FPMR S101-26-301(d)).

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
20.	Definitions regarding small purchases are out of date in terms of current values. This refers to the \$50 exemption used in Federal Supply Schedule contracts and the \$2,500 ceiling contained in the Federal Property and Administrative Services Act of 1949.	ASCS	This constraint received close scrutiny by the Holifield Commission on Government Procurement. P&O has been informally advised that the Commission is considering recommendations to the Congress which will raise these dollar limitations. Since these constraints are based either on Statute or on GSA regulations, the best hope for any change will probably have to come through the Commission's recommendations. P&O made its views known to the appropriate study group of the Commission, and no further action is anticipated by P&O on this constraint unless Congress decides to act on the Commission's recommendations.
21.	As stated in 4 AR Chapter 2, GSA is responsible for space maintenance. However, the char service is inept. Office cleaning and maintenance are not being done adequately.	ASCS	This results from budget constraints within GSA.
22.	In accordance with GSA Regulation No. 101-32.403-1(c), prior approval from GSA is required to procure ADP equipment. Since there is apparently no inspection or other significant effort by GSA to determine if a request is valid, approval by the OMS/USDA should be sufficient.	FAS	GSA involvement is required by Statute, which authorizes and directs the Administrator of GSA to coordinate and provide for the economic and efficient purchase, lease, and maintenance of automatic data processing equipment by Federal agencies. The Office of Management Improvement has been delegated overall Departmental authority and responsibility for ADP management. AGPR 4-1.4 is being revised to recognize this authority. If the proposed amendment to the AGPR is adopted in its present form, then for all practical purposes, OMI will be the only contact necessary for all internal USDA agencies. Any required contacts with GSA will be handled by OMI.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Plant and Operations</u>
23.	Because maintenance needs of USDA buildings are inadequately represented by GSA in its appropriation requests, costs of needed renovations are passed on to other agencies. There is a chronic shortage of laborers and a questionable sense of job priorities.	FAS	This results from budget constraints within GSA. P&O does establish priorities when necessary on USDA-funded workorders.
24.	Only the Office of Plant and Operations can make commitments to GSA to occupy or pay rental for real property for periods in excess of one year.	FS	Removal of this constraint would not serve any real purpose since FS would apply the same constraint to the field. Therefore, the restriction will be retained.
25.	Authority to negotiate after advertising when all bids are rejected must be obtained from the Department.	SCS	The Department has received only three requests since 1965 for this authority. In view of the sensitivity in terms of public criticism of use of this authority, P&O Staff should be used to research the need for its use rather than each agency maintaining the necessary common law references. The approval requirements will accordingly be retained.
26.	Department regulations for establishing headquarters sites place an unnecessary burden on agencies in the selection of locations for offices, laboratories, and facilities.	SCS	Administrative Regulations 1 AR 673 were revised June 24, 1971.



IV. OFFICE OF THE GENERAL COUNSEL

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the General Counsel</u>
1.	Prohibition of the transfer of equipment from one private school to another in the Nonfood Assistance Program.	FNS	The language of the statutory provision of the Child Nutrition Act lends itself to an interpretation that the equipment may be used by nonprofit private schools as a class and that only after it can no longer be used in the program by such schools generally shall it revert to the United States.
2.	Subpena of employee or records required Washington OGC approval. Field offices of OGC could approve quicker.	FS	The restraint will be continued because of Department of Justice requirements.
3.	Reporting of fiscal liability cases requires Washington OGC determination. OGC field offices could expedite.	FS	The constraint will be continued because all cases involving civil and criminal irregularities by Department employees are handled by OGC in Washington.
4.	Requiring Office of the General Counsel to clear rules pursuant to market agreements and/or orders.	C&MS	Constraint removed. Thus 200 marketing agreements will not have to be sent through OGC for clearance.
5.	Requiring Office of the General Counsel to clear budget and rate of assessment dockets for marketing agreement and order programs.	C&MS	Constraint removed. Thus 75 additional dockets per year will not have to be sent through OGC for clearance.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the General Counsel</u>
6.	Required to report all identical bids to the Department of Justice. In our opinion this reporting no longer serves a useful purpose.	C&MS	Following receipt of a memorandum dated January 28, 1970, from C&MS on this subject, a meeting was held with the representatives of the Department of Justice in the hope that this reporting requirement could be eliminated. On May 7, 1970, that Department informed us that the reporting of identical bids would still be required. It suggested, however, a simplified reporting procedure which was forwarded to C&MS on May 19, 1970, for its consideration and adoption if deemed appropriate. Action to further modify this requirement does not appear practical at this time.
7.	Authority for determination on claims of mistakes in bids has not been delegated to Regional Attorneys, resulting in delays and numerous reviews.	FS	This constraint presently under consideration.

# V. OFFICE OF BUDGET AND FINANCE

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
1.	Request to Treasury for bond of indemnity is restricted to agency head.	FHA	Treasury Department advises that delegation may be authorized as long as we do not do so to field officials. Title 7 of the Administrative Regulations has been revised to delegate this authority to Chief Fiscal Officers.
2.	Approval of foreign travel.	C&MS, ARS, FS	New procedures simplifying foreign travel approval were put into effect June 26, 1970.
3.	Restrictions on authority to redelegate certain travel authorizations (approval of superior accommodations, per diem for illness in excess of 14 days, and travel of non-Government persons).	FS	<p>The Administrative Regulations have been revised to allow the redelegation of authority to approve superior accommodations and per diem for illness in excess of 14 days.</p> <p>However, travel by non-Government persons is such a sensitive matter that agency heads or acting agency heads should be personally aware of such travel. This provision should be retained.</p>
4.	Restriction on actual subsistence reimbursement to non-Government persons.	FS	<p>The Department regulations on per diem, which were approved by the Program and Budget Review Committee in November 1969, provided that non-Government persons traveling on Government business shall receive \$25 a day. These regulations also provide that authority to pay actual expenses should be approved by the Director of Finance.</p> <p>The majority of non-Government persons traveling are consultants and members of advisory committees. There is a need for consistency to the maximum extent possible across agency lines in the USDA. For this reason, this requirement should be retained.</p>



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
5.	Approval of work for other agencies where full cost will not be recovered.	FS	This constraint applies to agreements between an agency of this Department and another Government agency which would involve Department appropriations bearing a part of the cost of the work performed for the other Government agency. This requirement is not unreasonable and involves such sensitive relationships with Appropriations Committees that it should be retained.
6.	Clearance of details to the Office of the Secretary.	FS	This requirement was instituted by the Office of the Secretary in order to document for the record all details or personnel to the Office of the Secretary, the White House, or elsewhere. Such information was previously conveyed by telephone. As a result, accurate reports were not available.
7.	Excessive reporting requirements on committees.	FS	<p>The major problem here is that the Forest Service had chosen to submit their report as of June 30 each year by the use of Form AD-241. The Forest Service has revised its procedures to report a listing of advisory committees, rather than a Form AD-241, for the June 30 report.</p> <p>The Office of Management and Budget has asked us to consider revisions in OMB Circular A-63 dealing with committee reports. As a part of this revision we will work out arrangements whereby all committee reports will be submitted at one time.</p>

No.	Subject	Agency	Decision of Office of Budget and Finance
8.	Approval of agreements with other agencies involving new types of service or large amounts.	FS	This requirement in 6 AR 326 is the only means by which the Secretary's Office can be informed in advance of proposed agreements between agencies which would involve the receipt of significant amounts of funds from other sources. This is an essential aspect of the financial management responsibilities. This Office must have knowledge of such items so that the Secretary's Office and the Appropriations Committees can be informed.
9.	Personnel ceilings.	FS	This is a requirement of the President for all Federal agencies in order to hold down Federal employment. The Department does not have discretion to change this requirement.
10.	Requiring Departmental approval for travel to Canada or Mexico to attend "Common Interest Meeting."	C&MS	This requirement was eliminated effective June 26, 1970.
11.	By limiting the application of statistical sampling to travel vouchers of less than \$100, this method is not useful to ASCS since the number of travel vouchers under \$100 is small.	ASCS	The constraint is imposed by law (31 U.S.C. 82 b-1). The law applies not only to travel vouchers, but to all disbursement vouchers of less than \$100. Consequently, the agency may be able to use statistical sampling if it applies this procedure to all vouchers of less than \$100 instead of only travel vouchers.

No.	Subject	Agency	Decision of Office of Budget and Finance
12.	Employment ceilings, established as of June 30 of each fiscal year, cause some agencies to lose prospective recruits among students graduating in May or June.	OIG	<p>The June 30 ceiling on employment is imposed by the Office of Management and Budget. It is the principal means by which Federal employment is controlled. We recognize that June is the optimum month for recruiting both high school and college graduates throughout the Department. It is also the end of the fiscal year and, therefore, is a logical time for applying an employment ceiling since increases in funds for the new budget year are not available until July 1 at the earliest. Agencies may overcome the constraint, at least to an extent, by giving graduating students a reporting date of July 1, a date which is usually only a few weeks beyond graduation and one which will provide the student with the necessary time to relocate from the school to his job assignment.</p>
13.	<p>The AR's require that attendance at National meetings be approved at the Washington office level. During fiscal year 1970, the Chief's Office processed requests for 1,692 people to attend meetings at an estimated cost of \$8,000. The number of requests disapproved in the Chief's Office was very small. The Chief should be allowed to redelegate this authority to Regional Foresters, Station Directors and Area Directors under certain conditions.</p>	FS	<p>The stated reasons for asking that this constraint be removed are that the cost of processing each request amounts to more than \$4.70 per request and that the number of disapprovals is very small. It is likely that the alternate system proposed which would delegate authority to lower levels in the organization for attendance at certain meetings while retaining this authority in the Washington office for others, monitoring attendance, and developing and executing an inspection system to assure that the guidelines are being followed, would be at least as expensive as the system now in effect. Further, one of the purposes of controlling attendance at a central point is to avoid excessive representation at any one meeting. We do not see how such a purpose can be achieved where approval authority has been delegated to several different persons within the organization. Also, the very low disapproval rate experienced by the Forest Service may be attributable to the fact that review by the Washington office is required. For these reasons we do not believe this constraint should be removed at this time.</p>



No.	Subject	Agency	Decision of Office of Budget and Finance
14.	1 AR 454a limits establishment authority of Public Advisory Committees to agency heads. The Chief of the Forest Service should be allowed to redelegate to Regional Foresters and Directors the authority to establish Committees, as they are fully capable of determining the need for such Committees. In addition, changes should be made in the use of Form AD-241, Committee Control Record. It is in need of revision, and need not be submitted to the Department as is now required. The handling of requests for extension of Interagency Committees should also be reviewed and improved.	FS	The present AR's are now being revised. 1 AR 456b of the revision states, "Regional, State, and local committees are established by authority delegated to agency heads. This authority may be redelegated. Action taken to approve the formation of such committees should reflect adequate justification and document the purpose and plans of committee operation."
15.	Each Federal agency is now responsible for auditing its own grant-in-aid funds expended by a State. This audit responsibility to one department of a State should be assigned to one Federal agency. This would eliminate the need of having many Federal auditors visiting the same State department to look at individual grant-in-aid programs.	FS	The possibility of assigning responsibility to a single Federal agency for audit of all Federal programs at a particular State agency was considered at length by the Office of Management and Budget and the interagency committee on Circular A-87. It was determined that such an approach is not presently practical because of a lack of trained audit personnel. The Federal programs to be audited are so varied in nature that it would be almost impossible for one person to perform a good program audit.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
16.	Agency must pledge collateral to secure public money in excess of \$20,000. Removal of the collateral pledge would eliminate several FHA forms and letters, reduce processing time, and prevent occasional delays in loan closing.	FHA	This requirement is based on 12 U.S.C. 265. This section of the Code authorizes the Secretary of the Treasury to require banks to pledge collateral for deposits of public monies in excess of \$20,000. The Treasury Department informs us that the present requirement cannot be removed. However, the Treasury Department expresses willingness to discuss procedural changes with FHA.
17.	A 1970 limitation of \$27.2 million was imposed on "Conservation Materials and Services," whereas the Budget provided for \$50 million.	ASCS	It is not possible to merge the outlay limitation for "advance materials and services" with the outlay limitation for the Agricultural Conservation Program because the former is financed by an advance from Commodity Credit Corporation funds. However, the limitation for "Advance Materials and Services" is merged with other non-price support expenditures financed with CCC funds. ASCS, in 1970, administratively broke out the funds for "advance materials and services" to meet their own internal requirements. It was not imposed by this office.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
18.	The authority of an Agency Head to authorize foreign travel, discussed in 7 AR 539, infers that the Agency Head may not delegate authority to authorize or approve foreign travel other than to meetings.	FS	<p>Title 7, paragraph 539c of the Administrative Regulations specifies the circumstances under which agency heads may delegate the authority to approve foreign travel. Delegation of authority is permitted in all instances in which approval by an Assistant Secretary or Director is not required.</p> <p>Travel requiring approval by an Assistant Secretary or Director should be approved first by the agency head or his acting to assure that the foreign travel to be approved in the Secretary's Office is essential and to assure appropriate representation in the case of foreign meetings. It is not necessary that travel authorization forms be returned to the agency head after approval in the Secretary's Office. Since they will already have been approved by the agency head, the forms can be returned to appropriate administrative levels for distribution to the traveler and others concerned.</p> <p>The requirement that certain travel be approved in the Office of the Secretary is indicative of the importance placed upon limiting foreign travel wherever possible. Accordingly, the requirement that such travel be approved by agency heads should be continued.</p>



No.	Subject	Agency	Decision of Office of Budget and Finance
19.	When a salary check is lost, stolen, or destroyed, MDSC requires a statement by the employee to be sent to New Orleans to initiate the cumbersome process. Upon receipt, the Treasury disbursing office is sent notice to issue a stop order on the original check and to prepare a substitute check. If everything goes well, a delay of only a few days occurs. However, if the lost, stolen, or destroyed check is not reported within ten days, the delay will amount to six to eight weeks.	OIG	<p>The MDSC operates under the overall guidelines for replacement checks established by the Treasury Department. Current procedures allow an employee to report the non-receipt of a salary check two days after the day it would normally have been received. This is well within the ten day limit and does not present any problem to employees. Substitute checks are then issued within a day or two.</p> <p>Treasury staff members advise that when checks are reported lost, stolen or destroyed after ten days from date of issuance, a thorough search has to be made. Experience has shown that by this time, theft and forgery are involved. In a large number of cases, it is found that employees have cashed their checks and forgotten they have done so.</p> <p>Treasury people advise that replacement is usually accomplished within one to three weeks. There appears to be no advantage in pursuing this matter further with the Treasury Department, and present procedures will be retained.</p>
20.	All irregularities of \$150 or more in the accounts of accountable officers are to be reported to the General Accounting Office through the Office of Budget and Finance. Considerable delay is caused by this requirement. The Agency proposes the amount be raised to \$500.	FS	<p>In March 1969, at the request of B&amp;F, the General Accounting Office granted the \$150 exemption to all Government agencies. At that time, a three-year survey showed that out of 31 cases submitted to GAO, only 6 shortages occurred in the \$150 to \$500 range. The infrequency with which these shortages occur should prevent an excessive administrative burden and a request to increase an exemption to \$500 will not be made without additional justification.</p>

No.	Subject	Agency	Decision of Office of Budget and Finance
21.	All proposals for indirect costs, developed by States, are required to be reviewed by cognizant agencies and sent to B&F for final approval. Since the Forest Service assists these agencies to develop satisfactory proposals, they believe they have adequate expertise to approve the rates. This would eliminate a number of reviews, enable the agency to provide the service to the States more quickly, and would lay the responsibility for approval at the point in the organization where the need to be responsive to the States would be keenly felt.	FS	Office of Management and Budget Circular No. A-87 provides that for each grantee department a single Federal Department will be responsible on behalf of the entire Federal Government for negotiating and approving an indirect cost rate proposal. Due to the intra-departmental use of the rates, there is need for a single contact point within the Department for the answering of inquiries and for the distribution of indirect cost rates approved not only by this Department but by other Federal Departments. Also, to apply to guidelines contained in the Circular consistently throughout the Department, there is a need for final review and approval at one office in the Department. Accordingly, the requirement will be continued.
22.	Budgetary constraints (including monetary, employment ceiling, and average grade constraints) hamper the program efforts of dynamic, rapidly changing, and sensitive programs.	FNS	In view of the relationship of these efforts to the President's economic program, and since they were established by the Office of Management and Budget, B&F is not in a position to remove or modify any of these constraints.
23.	The Forest Service is limited to \$25,000 total for paid consultants, which prohibits the agency from utilizing the talents of high level scientists.	FS	The limitation is set in the administrative provisions of the agency's appropriation. Therefore, the matter is one of law. If the FS wishes to increase this limitation, it may propose to do so as part of its budget submission.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
24.	Departmental approval is required for all international meetings and for most other foreign travel.	FS	The main reasons for approving individual trips by Assistant Secretaries are to assure appropriate representation of the Department at foreign meetings and the necessity for limiting foreign travel whenever possible. The proposed suggestion would not assure the necessary kind of control. The requirement will be retained.
25.	Personnel ceilings and fund impoundments restrict program managers in achieving planned operating performance.	SCS	These constraints exist because of Presidential policies, established after due consideration of the consequences and alternatives.
26.	Change from annual to multi-year program and financial planning to achieve goals resulting from complex public programs.	SCS	Because of the great degree of uncertainty surrounding many USDA and other Federal programs over a two-to-five year horizon, and the uncertainties regarding tax policies and Federal revenues, Presidents have not found it feasible to develop comprehensive multi-year projections of spending and revenue patterns in detail. During the last two years, the President's Economic Report and Budget have presented very aggregate 5-year projections of Federal revenue and spending profiles, but without specific program commitments.
27.	Agencies are not authorized to finance all administrative expenses from one source fund.	ASCS	The Appropriation Committees of Congress have a major interest in this question. This idea has been discussed informally but has not been adopted because separation of administrative expenses from the program expenses tends to distort the true cost of any given program, program funds may be increased or decreased without needed changes in administrative funds for that program, and the proposal could add a new account for several agencies of the Department. The constraint will be retained.



<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
28.	Agencies are required to prepare project obligations estimates. They must begin when the House and Senate agree on appropriation amounts, but cannot be completed or approved until enactment of the Appropriations Act.	ASCS	The Office of Budget and Finance will soon issue revised procedures to simplify this process and at the same time provide adequate control over the funds by budget activity.
29.	Requirement for annual reports for administrative and program support costs.	ASCS	At present there is no regular, recurring annual requirement for administrative and support costs. Such data have been requested at various times to meet specific needs or requests. It will still be necessary to request such data from the agencies from time to time to meet management needs.
30.	Requirement for project statement - Explanation of Increases and Decreases at Agency and Departmental Estimates Level.	ASCS	The need for these data varies from year to year and were not requested for the fiscal year 1973 since other data were available to meet the need. The data will be requested only when required to permit adequate review and analysis of budget estimates.
31.	Requirement to transmit SF-1151, Non-Expenditure Transfer, through the Office of Budget and Finance.	ASCS	The Director of Finance of the Department has been assigned the responsibility to approve authorizations for transfer of funds to, from, or within the Department. Most of these transfers should continue to be processed through B&F in order to assure adequate financial control. However, ASCS will be authorized to sign SF-1151 transfers in those instances where no discretion can be reasonably exercised by the Department.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
32.	The Department requires submission of Reports on Budget Status, SF-133, on a quarterly basis. Forest Service funds have been approved, for apportionment purposes for periods ending October, February, and June. The FS recommends reports be required consistent with apportionment periods.	FS	The Agency has withdrawn this constraint. No action was taken.
33.	The Department requires that proposals for the transfer of funds under the Department's 7 percentum interchange authority be presented in memorandum to the Secretary. In most cases, the Appropriations Committees are notified by letter signed by an Assistant Secretary. This is duplication of effort, and the Forest Service recommends the Departmental approval be eliminated.	FS	<p>The two letters fulfill different functions. In the letter to the Secretary, an agency must justify the transfer of funds. The Secretary must approve the interchange. The justification submitted to the Secretary for the proposed action must be sufficiently comprehensive to enable him to make a decision regarding the interchange.</p> <p>Once the Secretary approves (or disapproves) the request, a second letter is prepared to explain the decision to the Appropriation Committees. The second letter has an entirely different purpose from the letter to the Secretary.</p> <p>Since the interchange authority is used only infrequently, perhaps an average of less than once each year, any savings resulting from adoption of this suggestion would be negligible.</p> <p>The requirement will be retained.</p>

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
34.	The Department requires as part of the budget presentation a "Cross Classification Table Relating Funds to Organizational Units." The Forest Service questions the use of this report and recommends it be eliminated.	FS	<p data-bbox="1037 251 1891 326">Office of Management and Budget Circular A-11, Section 24.2 states:</p> <p data-bbox="1072 366 1967 703">"Where budget activities and organizational units do not coincide, there shall be included: a cross-classifying table which will show organizational totals and how they are distributed by activities, an explanation of the basis for distributing such charges, and such additional explanation as may be needed to justify the size and financial requirements of each organizational unit."</p> <p data-bbox="1037 743 2004 1079">Questions regarding the costs of operating specific organizational units are often received by the Department. For example, recent reorganization proposals have been advanced. In the consideration of such proposals it is necessary to know the budget of the organizational unit where only specific units of an organization are to be transferred. These tables have been referred to in responding to certain reorganization proposals in the past.</p> <p data-bbox="1037 1119 1989 1310">Also in the consideration of manpower ceilings, it is often necessary to review employment by an organizational unit. Such information should be supported by the budget for these organizational units as well.</p> <p data-bbox="1037 1350 2044 1387">For these reasons this requirement should be retained.</p>



No.	Subject	Agency	Decision of Office of Budget and Finance
35.	<p>The Department requires that apportionment requests be submitted within 7 days after the amount of appropriation is in agreement between the Senate and House of Representatives. The Department is required to submit the request within 15 days after passage of the Appropriations Act. The Forest Service recommends the agency request requirement be changed to 7 days <u>after passage</u> to allow sufficient time to get meaningful field input.</p>	FS	<p>Any extension of time for agencies would necessarily reduce the time for review by the Department. The agency suggests seven days after passage for agency review, thereby leaving eight days for Department review. Although this appears to be equitable it fails to consider that the Department has to review all apportionment requests from all agencies and its workload is therefore several times greater than any agency. Further, often clearance by the Secretary or another top policy official is required before an apportionment schedule can be submitted.</p> <p>Furthermore, House and Senate bills often are in agreement before final passage. Where this is the case agencies can immediately begin to prepare apportionment schedules. They need to be concerned only with those relatively few items where there is disagreement. It would appear that seven days is a sufficient amount of time for the agency to resolve apportionment issues after the House and Senate have reached an agreement.</p> <p>In unusual cases we would be willing to consider an extension of time to an agency. However, the requirement will be retained.</p>
36.	<p>The Department requires a Project Obligation Estimates report justifying any changes from that submitted as Budget Estimates. This has been a perfunctory report with no follow-up, and the Forest Service recommends it be discontinued.</p>	FS	<p>In December 1971 the Office of Budget and Finance completed a review of its requirements for Project Obligation Estimates and issued an amendment to the Administrative Regulations which substituted "Obligations by Activities Schedules" for the Project Obligation Estimates. The need for these schedules is explained in the amendment to the Administrative Regulations, and no additional changes are planned at this time.</p>

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Budget and Finance</u>
37.	All proposed transfers or advances of funds to, from, or within the Department by the advance working fund procedures under section 601 of the Economy Act are required to have written approval of the Department before final commitments are made or agreements concluded.	FS	The authority to approve transfers of funds between agencies carries with it, for example, the authority to approve such items as employment ceilings. Obviously, if we agree to perform work for other agencies it will be necessary for us to allocate sufficient manpower to carry out this work. When operating under a set employment ceiling any increases for work for other agencies would have to be offset by decreases in manpower for the on-going work of the Department. Obviously, such decisions have to be made within an overall Departmental framework in order for manpower and funds to be applied in a manner most consistent with Departmental objectives. Therefore, the requirement will be retained.
38.	The Department must provide prior approval of agreements for reimbursement which include an amount that is large in comparison with the total normal reimbursable activities of the Forest Service. This constitutes obligational approval since the appropriation must be apportioned to handle the reimbursable work.	FS	The authority to provide additional services on a reimbursable basis carries with it, for example, the authority to approve such items as employment ceilings. Obviously, if we agree to perform work for other agencies, it will be necessary for us to allocate the manpower to do the additional work. When operating under a set employment figure, any increases for work for other agencies would have to be offset by decreases in the on-going work of the Department. Therefore, such decisions have to be made within an overall Department framework in order for manpower and funds to be applied in a manner most consistent with Departmental objectives, so the requirement will not be changed.

VI. NATIONAL AGRICULTURAL LIBRARY

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of National Agricultural Library</u>
1.	Reports of scientific and technical information of the Federal Council for Science and Technical Information. Agency submits reports but it never finds anything included in the one-page summary for the whole Department.	C&MS	Chairman of COSATI has advised that they will be happy to have lengthy reports for their records. However, it will be necessary to summarize information for publication purposes since their annual report presents accomplishments for all Federal agencies.



# VII. OFFICE OF THE INSPECTOR GENERAL

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Inspector General</u>
1.	Agencies are required to refer all employee misconduct cases to OIG except certain "minor infractions, . . ." Agencies could resolve many of these cases, thus expediting handling and avoid embarrassing the Department.	C&MS	This constraint will be continued as we believe complete objectivity can best be obtained in these cases through investigations by a disinterested and impartial agency.
2.	Cases of theft must be referred to OIG who, in turn, refers them to FBI. Agencies could refer cases directly to FBI, saving time.	FS	Inspector General Memorandum No. 12, Revised, dated July 24, 1969, provides for direct referrals to the FBI with concurrent advice to OIG.

VIII. OFFICE OF MANAGEMENT IMPROVEMENT

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Management Improvement</u>
1.	Quarterly Report on Communications and Services to the Public. Does not seem to serve a worthwhile purpose.	C&MS	This reporting requirement was eliminated in a Recision Notice for Secretary's Memorandum No. 1588, Supplement 2, dated August 28, 1970, and signed by J. Phil Campbell as Acting Secretary.
2.	Clearance and reports - ADP services. Should be revised to eliminate overlapping and repetitive reporting.	C&MS, FS	OMB and GSA have completed a review of these clearance and reports requirements. The overlaps are not completely resolved. Requirements in the ADP clearance and reporting area are still in a developmental stage and new ones are still being added; we do not, therefore, see an early consolidation of all external requirements occurring. OMI is continuously reviewing procedures to make these requirements better understood in the Department, but these constraints will continue in any event.
3.	Mandatory use of Federal Information Code Standards. This requires redesign of present systems around a code instead of the use of codes to fit the system.	SRS	The Federal Information Processing Standards (FIPS) were established to eliminate the overlapping, inconsistent and duplicative standards in use by Federal agencies. No FIPS are adopted without coordination within and outside of the Government. Benefits to the Government will outweigh any discomfort to any single agency. Furthermore, waiver procedures regarding these requirements are available and have, in fact, been successfully utilized by the complaining agency. No action will be taken to remove the FIPS now in existence.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of Office of Management Improvement</u>
4.	Current constraints of \$25,000 each for ADP services, software, and ADP equipment improvements impose an unnecessary burden and time delay on the agencies. OMI could perform their same functions with a delegated authority of \$100,000 to each agency. A regular report would be sufficient for OMI to keep abreast of agency activities.	FS	OMI is currently studying the delegations of authority for ADP, and new delegations of procurement authority for ADPE will be published in the AGPR's. However, delegations to \$100,000 would not be consistent with GSA requirements or with the objectives of the USDA Information Systems Plan.
5.	Requirement that use of all telecommunications facilities for data transmission must be cleared through GSA.	FS	The constraint is imposed by GSA, and GSA has been requested by letter to comment. To date, they have not replied.



IX. THE SECRETARY

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Secretary</u>
1.	The ASCS Commodity Offices have been hampered in their inventory management operations, since the implementation of Secretary's Memorandum No. 1567, which transferred warehouse examination of CCC-owned inventories from ASCS to C&MS. Commodity Offices must now go through C&MS for warehouse inspection and examination of inventories for which ASCS has program and contractual responsibility.	ASCS	Warehouse examination should stay in C&MS. It was suggested that a joint ASCS-C&MS program team review the operation of this program to resolve any local operating problems.
2.	Section 6026 of the Food and Agriculture Act of 1965 requires the Secretary to designate areas where CAP land may be used for grazing and haying under emergency conditions. However, the Secretary may delegate this authority. Considerable time could be saved in designating such areas if this authority were delegated to the agency Administrator. Under the current procedure, field offices are reporting 30 to 60 days' delay in obtaining Washington approval.	ASCS	This requirement will be retained.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Secretary</u>
3.	Public Law 85-58, of June 21, 1957, specifically states that the Secretary of Agriculture will make payments to farmers who carry out Emergency Conservation Measures in designated areas. However, the Secretary may delegate this authority. Considerable time could be saved in designating disaster areas if this authority were delegated to the agency Administrator. Under the current procedure, field offices are reporting 30 to 60 days' delay in obtaining Washington approval.	ASCS	This requirement will be retained.
4.	A memorandum signed by the Executive Assistant to the Secretary, dated August 12, 1966, requires that a press release be issued prior to notification of a successful contract bidder.	ASCS	This constraint was removed.
5.	Agency must submit monthly reports on civil rights activities. A quarterly report would greatly reduce the paperwork involved.	SCS	The White House has directed the Department to submit a monthly Civil Rights report. Therefore, monthly reports from agencies are necessary.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Secretary</u>
6.	The Weekly Travel Schedule (RCS 1000-01) is a report requested by the Office of the Secretary projecting travel, meetings, and speeches of the Chief, Associate Chief, and others, and is due at 5:00 p.m. each Wednesday. A similar weekly report (RCS 26-1600) concerning major activities of the Forest Service is submitted to the Secretary each Tuesday at noon. This is a duplication of effort.	FS	With respect to duplication as a result of the Weekly Agency Activity Reports to the Secretary, these two functions are completely different. One deals primarily with activities, operations, and general information which should be brought to the attention of the Secretary, while the other deals solely with travel schedules and speaking engagements. The latter is used primarily by the Office of Information and public relations people. Because the two reports are processed in a completely different manner, it would be very inconvenient to combine them.
7.	The delegation to the Commodity Exchange Authority contains a reservation to the Secretary to designate contract markets, to promulgate regulations, and to issue complaints. These authorities have been delegated to the Assistant Secretary. Delegation of these authorities to the Administrator of the Commodity Exchange Authority should facilitate the administration of the Commodity Exchange Act and expedite the designation of contract markets and the issuance of regulations and complaints.	CEA	The requirements will be retained.



No.	Subject	Agency	Decision of the Secretary
8.	Requirement to prepare estimates by PPB Program and category since the agency does not use the PPB structure for program and financial planning serves no management purpose in the agency.	ASCS	Data generated by the present ASCS planning system will be used to the maximum extent feasible. The Department is ready to work out procedures with ASCS to eliminate all unnecessary duplication of effort. The Department is willing to consider alternatives to the presently proposed classifications, providing they also serve the needs of the Department's mission-oriented program planning and budget structures.
9.	Membership on State Rural Development Committees does not provide for State Forester representation. He can achieve membership only at the discretion or special invitation of the Chairman.	FS	This constraint is presently under consideration.
10.	Requirement for annual review of Pest Control Programs and Projects by the Working Group on Pesticides duplicates the efforts of the review of Environmental Impact Statements.	FS	This constraint is presently under consideration.
11.	County Committees sometimes reduce the amount allotted individuals to substantially less than the landowner requests for forestry planting or timber stand improvement. Therefore, the work extends over a number of years, resulting in inefficiencies and discourages participation in ACP Forestry Practices.	FS	This constraint is presently under consideration.

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Secretary</u>
12.	Laws preventing the creation of or addition to National Forests in certain States except by Act of Congress discourage beneficial minor adjustments of forest boundaries.	FS	This constraint is presently under consideration.
13.	Additions may be made to the National Forests in Montana by Executive action, but only when the lands are chiefly valuable for timber production or for the protection of watersheds and the lands are to be reserved from the unappropriated public domain. There are additional widely-supported reasons for adding lands to the National Forests including non-public domain lands.	FS	This constraint is presently under consideration.
14.	Reporting of non-competitive sales of common variety mineral material is required to FS headquarters and Congress. It does not appear that Congress would be interested in small non-competitive sales.	FS	This constraint is presently under consideration.

# X. OFFICE OF MANAGEMENT SERVICES

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Office of Management Services</u>
1.	OMS has partial authority to examine and appoint clerical personnel to career conditional positions. Since OMS does not have full appointment authority within the GS-1 through GS-5 grade levels, its capabilities in serving its designated agencies is limited.	OIG	The CSC grants "643 recruiting authority" to agencies only when it is unable to carry out the examining and certification function rapidly enough to meet urgent needs. At present, CSC is able to carry out this function and has not granted the authority to OMS. However, this does not severely limit OMS capabilities in serving its agencies. Agencies' appointment authority, of about four months, and various available methods of appointment should give them adequate capability to obtain qualified clerical help.

# **XI. ECONOMIC RESEARCH SERVICE**

<u>No.</u>	<u>Subject</u>	<u>Agency</u>	<u>Decision of the Economic Research Service</u>
1.	Only one printout of agricultural census data on imports and exports is supplied to the Department by the Census Bureau. ASCS wastes time and effort copying information from reports furnished ERS.	ASCS	Under the existing contract with the Bureau of the Census, five copies of the referenced report, "U.S. Agricultural Specialist Runs," were received in the Economic Research Service for data verification and distribution. In order to correct the subject constraint, the Bureau of the Census agreed to send us six copies of this report. In addition to ERS, four Department agencies, including ASCS, will now receive copies of this report.



## XII. REPORTED CONSTRAINTS RETURNED TO AGENCY

One agency reported a total of 8 constraints during 1970 which were not referred to a staff office for response but were returned to the agency. The reported constraints were not appropriate for inclusion in this report, as follows:

- 4 reported constraints concerned with internal operating procedures;
- 1 reported constraint required no further action because of prior statutory changes;
- 3 reported constraints concerned legislation and could not be dealt with in the FAR program.

## XIII.

USDA Agencies Action on Internal Constraints

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
ASCS	See Accomplishments	<p>The agency has reviewed a total of 110 internal constraints reported by State and Washington offices. These constraints concerned a broad range of agency administrative and program activities. 1969-71 accomplishments are summarized as follows:</p> <p>1969: 25 constraints reported; 2 removed.</p> <p>1970: 85 constraints reported; 21 removed; 52 retained; 8 were not considered as constraints.</p> <p>1971: 0 new constraints reported; 3 constraints removed; 1 referred to the Department.</p>
CEA	<ol style="list-style-type: none"> <li>1. Disclosing CEA Information to Exchange Officials. Only the Administrator had the authority. It caused difficulties because Exchange officials could take action promptly against a problem trader or firm.</li> <li>2. Authority to issue subpoenas was restricted to Administrator.</li> </ol>	<p>By his memorandum of January 12, 1970, the Administrator redelegated his authority to the Regional Directors.</p> <p>In a memorandum dated January 13, 1970, the Administrator asked the General Counsel of the Department to revise the delegation of authority for the issuance of subpoenas to permit redelegation.</p>

(continued)

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
CEA cont'd		<p>Additional action, 1970:</p> <p>Public Law 91-452, enacted October 15, 1970, amends section 6(b) of the CEAct, effective December 14, 1970, by striking the references to 49 U.S.C. 46, 47 and 48 (the immunity provisions of the Interstate Commerce Act). The immunity provisions which will govern on and after December 14, 1970, will be those contained in 18 U.S.C. 6001-6004. Under these provisions a witness will not obtain immunity on the basis of privilege unless he is compelled to testify after he refuses to testify on the basis of his privilege against self-incrimination. However, CEA will not be able to compel a witness to testify after he has claimed privilege, unless approval of the Attorney General is obtained. These new provisions raise serious problems which, hopefully, the Department of Justice will give us some guidance on in the very near future. Meanwhile, the Agency will avoid use of investigatory subpoenas until we receive clarification of the new law, and no action is being taken to redelegate the authority to issue subpoenas to the Regional Directors.</p>
C&MS	<p><u>Personnel Action</u></p> <p>Unable to enforce misconduct and unsatisfactory work performance regulations. Some procedures in C&amp;MS Instructions not enforceable.</p> <p><u>Training</u></p> <p>Requiring Personnel Division Director's prior approval (up to 80 hours) for outside (non-government) training.</p>	<p><u>Removed.</u></p> <p>Issued C&amp;MS Notice 1182 on September 25, 1970, informing all supervisors of change in Unsatisfactory Performance Rating procedures. Under new procedures, the Notice will be filed with C&amp;MS Instruction 347-1 for indefinite retention. Revision of Instruction 347-1 being held pending implementation of new USDA-wide Performance Rating Plan.</p> <p><u>Removed.</u></p> <p>C&amp;MS Instruction 380-4, issued August 5, 1970, delegates authority to approve 80 hours or less. Delegation is to Division and Staff Directors, and Directors of Regional Offices. A new "omnibus" C&amp;MS Instruction covering training is now being cleared.</p>

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
C&MS cont'd	<p><u>Training (cont'd)</u> Requiring Personnel Division Director's prior approval (80-800 hours) for outside (non-government) training.</p> <p><u>Instructions and Guidance Documents</u> Terminology used in MICAP (Meat Inspection Career Appraisal Program) is cumbersome and confusing.</p> <p>Too much paperwork required of Consumer Protection personnel.</p> <p><u>Work Measurement</u> Cumbersome and confusing terminology used in work measurement procedures in Consumer Protection Programs.</p> <p><u>Non-Use of Available Data</u> Information requested of field offices by Consumer Protection Regional Offices when information already available in Regional Office.</p>	<p><u>Removed.</u> By Redelegation of Authority, dated February 19, 1971, the Director, Personnel Division, redelegated to the Chief, Employee Development Branch, authority to act as approving official for outside training not exceeding 20 weeks (800 hours).</p> <p><u>Constraint removed.</u> Revised MICAP is not cumbersome and confusing.</p> <p><u>Partially removed.</u> Thorough review of reporting requirements being carried out by National Archives and Records Service with objective of simplifying reports process.</p> <p>Removal delayed due to lack of personnel. Work standards and instructions will be simplified and updated when personnel available.</p> <p>Organizational structure change will reduce, if not eliminate, such queries. In interim, focal point established for queries to Regional Offices to help diminish such queries. National Archives and Records Service study will also help reduce queries.</p>



USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
C&MS cont'd	<u>Procurement</u> Clearance must be obtained from Field Operations Branch, Administrative Services Division, for services costing \$50 or more.	<u>Removed.</u> Pertinent Instruction permits the Field Operations Branch to delegate special authorities to field offices. Complainant notified of delegation possibility.  During 1970, additional accomplishments have been made, as follows:  Of 31 constraints reported, 11 were removed; 1 was modified; 3 were retained temporarily pending other actions; 15 were retained for good management; and 1 was withdrawn.
FHA	See Accomplishments.	The National Office staff of Farmers Home Administration has been restructured to enable the agency to adapt more effectively to changes in program emphasis now taking place and scheduled for the future. All agricultural-type loans have been placed under the supervision of an Assistant Administrator, Farmer Programs. The rural housing program has been elevated to major organizational rank under an Assistant Administrator, Rural Housing. Community facilities are to be supervised by a new Assistant Administrator, and the former Assistant Administrator, Rural Development position, is replaced by an Assistant Administrator, Special Projects, to handle rural development, OEO activities, and other selected functions.  A corresponding realignment of State Office staffs is now in progress.

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FHA cont'd	See Accomplishments.	<p>Delegation of Personnel Management and Staffing Responsibilities to State Directors.</p> <p>In order to decentralize our control of staffing State and county offices, we have delegated to State Directors full authority to assign, transfer and promote to all positions within each State office jurisdiction, in accordance with established qualification standards, staffing criteria, and authorized manpower ceilings. This action removes these controls from the National Office to the State Office.</p> <p>Establishment of Loan Specialist Position in County Office.</p> <p>Recognizing the change in many areas from agriculture-type loans to nonfarm loans and grants, Farmers Home Administration will establish a standard position of loan specialist supervisor to handle nonfarm-type business in localities where rural employees can be fully occupied. This position will generally parallel our long established farm management specialist supervisor position. A survey is now in progress to determine how many such positions may be needed. We believe it will provide a much larger group of applicants from which to select for employment and at the same time increase total skills available to the agency.</p> <p>Implementation of Financial Management Program.</p> <p>Farmers Home Administration is commencing the implementation of a Financial Management Program which will ultimately enable the agency to capture more precise cost figures in accordance with standardized accounting procedures. The system will also result in delegating more fiscal and budgeting responsibilities to our State Directors. The agency is now recruiting a qualified accountant to head up this activity.</p>

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FHA cont'd	See Accomplishments.	<p>Marketing Insured Notes.</p> <p>Organization of a large syndicate of leading investment banking firms to market an initial issue of \$350,000,000 insured FHA notes not only inaugurated an entirely new marketing technique for this kind of investment, but greatly simplified the problem of continuous funding of current programs by providing easier access to major investors.</p> <p>Delegation of Association Loan and Grant Approval Authority to State Directors.</p> <p>Procedural revisions have been processed which will make further delegations to State Directors of approval authority relating to both loans and grants for such purposes as water and waste disposal and comprehensive area planning.</p> <p>Delegation of Rural Rental Housing Loan Approval to Selected State Directors.</p> <p>Delegations to selected State Directors, based on accumulated experience, have been made to approve rural rental housing loans. Authority has been delegated to all State Directors.</p> <p>Authorizing County Supervisors to Approve Loans on Properties They Appraise.</p> <p>An improved service to rural housing applicants has resulted from recent authority granted to qualified County Supervisor Appraisers to also approve loans on non-farm properties they have appraised.</p>

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FHA cont'd	See Accomplishments.	<p>Upgrading of County Office Clerical Positions.</p> <p>Because of the increased complexity of county offices clerical duties, Farmers Home Administration has provided for upgrading many of these positions as they meet the qualifications on an individual basis. This action will reduce the turnover in these positions and facilitate the recruitment of new employees.</p> <p>Establishment of Construction Inspector Positions.</p> <p>Because of the frequency of inspections required and the complexity of many construction projects financed by Farmers Home Administration, better service has been provided borrowers by establishing Construction Inspector positions. Approximately 250 are presently employed. These positions are filled by temporary appointments.</p>
FNS	See Accomplishments.	<p>1. Food Stamp Programs -</p> <p>Decentralization of Food Stamp Recipient Claims Determinations:</p> <p>Legal approval has been received, and a procedure has been developed whereby State agencies and FNS Regional Offices can settle certain Food Stamp Claims. Previously, all claims were handled by FNS, Washington, and considerably more paperwork was involved.</p>



USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FNS cont'd	See Accomplishments.	<p>2. Commodity Distribution Programs - Decentralization of Commodity Distribution Claims Determinations:</p> <p>Proposed regulatory change has been submitted to the Office of the General Counsel to obtain approval to allow State agencies and FNS Regional Offices to settle certain Commodity Distribution (CD) Claims. Currently, all CD claims are handled by FNS, Washington. This is awaiting final clearances.</p> <p>3. Increased delegations of authority have been made to FNS Division, Staff, and Regional Directors regarding employee awards.</p> <p>Line management is now more directly involved in the Employee Awards Program as result of the increased delegation of authority. Authority to approve employee suggestions, with cash awards up to \$300, was given to Division, Staff, or Regional Directors. In addition, these officials are now authorized to approve quality increases for their employees in grades GS-1 through GS-13. It is anticipated that the expanded delegations will result in an increase in employee suggestions.</p>

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FS	See Accomplishments.	<p>To meet the objective of placing decision-making authority at the lowest feasible level, the Forest Service conducted a service-wide review of existing delegations of authority and internal constraints. All delegations of authority were checked against the following criteria to determine if improvements in practices could be made:</p> <ul style="list-style-type: none"> <li>- competence of employees;</li> <li>- coordination requirements;</li> <li>- size of programs;</li> <li>- staffing and skills available;</li> <li>- tools to do the job.</li> </ul> <p>In order to accomplish the service-wide review, the Forest Service policy on delegating, along with related procedures and practices, was first thoroughly examined and clarified. Directives involved in these areas are being revised.</p> <p>A comprehensive review of delegations of authority was then made by the Washington office to determine if the delegations were proper or if further delegation to lower levels was feasible.</p> <p>A few delegations were identified through this preliminary review and were modified to permit delegations to field offices. A complete summary of Forest Service delegations was then prepared. This summary included over 800 elements.</p>

USDA Agencies Action on Internal Constraints (cont'd)

<u>Agency</u>	<u>Constraints</u>	<u>Accomplishments</u>
FS cont'd	See Accomplishments.	<p>This summary was sent to Regional Offices, Experiment Stations, and Area Offices for critical review. A copy of the summary with accompanying letter of transmittal is attached for your information. Each unit was requested to review delegations withheld by the Chief or higher level for adequacy and make recommendations on those felt unnecessarily restrictive. The units were also instructed to review delegations and constraining procedures and practices within their own units and make whatever changes needed to place authority for decision-making at the lowest feasible level.</p> <p>All Regional Offices, Stations, and Area Offices have or are identifying their own unnecessary constraints or restrictive delegations and will be modifying their directives to reflect the change of authority where necessary.</p> <p>Recommendations to the WO from the units concerning unduly restrictive delegations or unnecessary constraints were catalogued by divisional responsibility and discussed with the Washington Office divisions concerned. The field units commented on about 15 percent of the 800 elements listed in the summary. Many of the comments, however, were due to misinterpretation of instructions in the directives system. All directive materials causing confusion in the field were then reviewed and those instructions actually needing clarification are now or will be rewritten shortly.</p> <p>Through discussion with the appropriate Washington Office division, we were able to identify several specific delegations or constraints recommended by field units as needing improvement and for which changes should be made. Directive material covering these items is now or will be processed soon.</p>



USDA Agencies Action on Internal Constraints (cont'd)

Agency	Constraints	Accomplishments
FS cont'd	See Accomplishments.	<p>There were other delegations or constraints identified by units as needing improvement but these will need further analysis in relation to principles of delegation before definite decisions can be made as to their applicability. We expect that after further study some of these will be modified. The elements under consideration will be monitored to assure adequate follow-up action.</p> <p>Continued efforts to identify and remove administrative constraints were made during 1970. Field units reported 134 constraints to the Washington Office. Divisions initiated directive and procedural changes to resolve constraints, and it is expected that at least 25 will be removed. In addition, 9 constraints are being studied further, and 18 external constraints are being forwarded to the Department for consideration.</p> <p>During the third year of FAR, the Forest Service again solicited field suggestions on unnecessary constraints. Several of these are being considered for removal or have already been removed by the Washington Office. Twenty-four external constraints were submitted to the Department, and 11 new authorities were delegated to Regional Foresters and Directors.</p>





